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October 7, 2022

Sean Mayo – Pipeline Safety Director
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

Subject: CNGC response to Areas of Concern RE: 2022 Natural Gas Standard Inspection – Bellingham Unit (Insp. No. 8423)

Dear Mr. Mayo,

This letter is intended to address three areas of concern stemming from a Standard inspection of Cascade Natural Gas Corporation's (CNGC) Bellingham Unit on August 15, 2022, through August 25, 2022.

AREAS OF CONCERN

I. WAC 480-93-180 Plans and Procedures

(1) Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.

Summary of Finding(s):

During the records review, staff asked for records validating the maximum allowable operating pressure (MAOP) for the Central Whatcom 8" HP segment 14C1344. The records were not available via CNGC's GIS system. Although the records were produced after some internal investigating, they should be located in GIS according to CNGC's procedure OPS 505-Pressure Testing. For this segment Form 23021 would have been used and the Record Retention table in OPS 505 clearly indicates the storage location as GIS.

Cascade Response

CNGC acknowledges the findings brought forth by the WUTC outlined above. An MOC has been initiated to revise OPS 505 – Pressure Testing to add clarification throughout the procedure for the upload of *Form 23021 Pressure Test Report* to GIS. Revised OPS 505 will implement on or before December 31, 2022. Notification will be provided to personnel responsible for filling out *Form 23021* and uploading the form to GIS.

Additionally, CNGC is evaluating future technology solutions for more efficient organization of documents housed within GIS.

2. WAC 480-93-110 Corrosion Control

(2) Each gas company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements.)

Summary of Finding(s):

During the field inspection of CNGC pipeline facilities, staff asked to inspect rectifier 47540-001-RE-0013 in Lynden. The rectifier appeared to be functioning normally, however, a pipe-to-soil read taken at the rectifier showed an instant off read of -850 mv while interrupting the protective current. The read so close to the rectifier should be much higher. CNGC should investigate why the read was lower than expected.

Cascade Response

CNGC acknowledges the findings brought forth by the WUTC outlined above. Investigation of the failure indicates CP current output decrease was from drier than normal soil conditions. The rectifier was replaced and sized to allow for fine adjustments during the arid months. The replacement was completed October 3, 2022.

3. WAC 480-93-110 Corrosion Control

(2) Each gas company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements.)

Summary of Finding(s):

During the field inspection of CNGC pipeline facilities, staff asked to inspect several cathodic protection locations where a pipe to soil read could be conducted. Two of these locations indicated a reading which did not meet CNGC's criteria in OPS 402 of -850 mv while interrupting the protective current. The following should be investigated and mitigated within 90 days of the date the read was taken, August 23, 2022:

- 47822-001-MP-0001 Bellingham 2 Meter station, Sumas; a read of -780mv was noted during inspection of AC SSD
- 47822-001-CA-0009 Lynden; when investigating this shorted casing a read was taken at the meter of 3273 East Badger Rd and read of -818mv was noted.

Cascade Response

CNGC acknowledges the findings brought forth by the WUTC outlined above. Upon investigation of CP location 47822-001-MP-0001, after all foreign CP current was interrupted, an IRF potential of -920mv was recorded, meeting the criteria of OPS 402 – External Corrosion Control. No repairs are needed at this location.

The steel service line and casing at 3273 E Badger Rd (47822-001-CA-0009) was replaced with a PE service line on September 30, 2022.

Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras". The signature is written in a cursive, flowing style.

Pat Darras
Vice President, Engineering & Operations Services
Cascade Natural Gas Corporation